

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

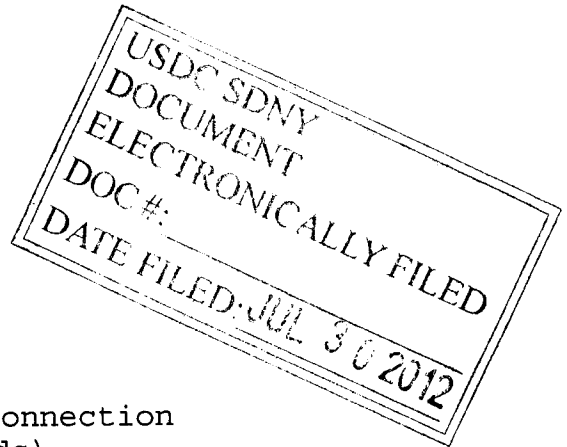
UNITED STATES OF AMERICA

- v. -

NOVELETTE CAMPBELL,  
a/k/a "Pat Campbell,"  
ARIDIO MARTINEZ and  
KESSIA GIRON,

Defendants.

12 CRIM 569



COUNT ONE

(Conspiracy to Accept Bribes in Connection  
with Federal Programs Funds)

The Grand Jury further charges:

1. From at least in or about April 2000 through in or about October 2011, in the Southern District of New York and elsewhere, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," ARIDIO MARTINEZ, and KESSIA GIRON, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, namely, to violate Title 18, United States Code, Section 666.

2. It was a part and an object of the conspiracy that NOVELETTE CAMPBELL, a/k/a "Pat Campbell," ARIDIO MARTINEZ, and KESSIA GIRON, the defendants, and others known and unknown, including agents of an organization, and of a State and local government and an agency thereof, which organization, government

JUDGE DANIELS

and agency received, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, would and did corruptly solicit and demand for the benefit of a person, and did accept and agree to accept, a thing of value from a person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government, and agency involving a thing of value of \$5,000 and more.

Overt Acts

3. In furtherance of said conspiracy and to effect the unlawful object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about April 2009, in Manhattan, New York, MARTINEZ solicited and accepted a cash payment in the amount of \$2,000 from a prospective tenant ("Tenant 1") to allow Tenant 1 to skip the waiting list for a federally subsidized housing development called East River Houses, formerly known as "Tricham Houses."

b. In connection with Tenant 1, CAMPBELL provided an application to Tenant 1, along with the keys to a federally subsidized housing apartment, knowing that Tenant 1 was not on the waiting list.

c. In or about the fall of 2008, in Manhattan, New York, GIRON solicited and accepted a cash payment in the amount

of \$3,000 from a prospective tenant ("Tenant 2") to allow Tenant 2 to skip the waiting list for a federally subsidized housing apartment at Tricham Houses.

d. In connection with Tenant 2, CAMPBELL met with Tenant 2, allowed Tenant 2 to complete the application, and issued Tenant 2 keys to a federally subsidized housing apartment in January 2009.

(Title 18, United States Code, Sections 371.)

COUNT TWO

(Accepting Bribes in Connection with Federal Program Funds)

The Grand Jury further charges:

4. From at least in or about April 2000 through in or about October 2011, in the Southern District of New York and elsewhere, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, being an agent of an organization, and of a State and local government and any agency thereof, which organization, government and agency received, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, to wit, the management company for Tricham Houses in Manhattan, did corruptly solicit and demand for the benefit of a person, and did accept and agree to accept, a thing of value from a person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government, and agency

involving a thing of value of \$5,000 and more, to wit, CAMPBELL accepted cash payments and other items in exchange for preferential treatment for individuals seeking federally subsidized housing.

(Title 18, United States Code, Section 666(a)(1)(B).)

FORFEITURE ALLEGATION

(Counts One and Two)

5. As a result of committing one or more of the bribery offenses alleged in Counts One and Two of this Indictment, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," ARIDIO MARTINEZ, and KESSIA GIRON, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real or personal, constituting, derived from, or traceable to proceeds obtained directly or indirectly from the offenses charged in Counts One and Two of this Indictment, including but not limited to over approximately \$70,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

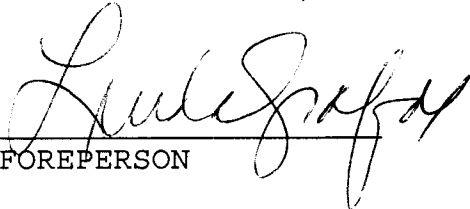
c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981, 371, 666 and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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Defendant.

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INDICTMENT

12 Cr.

(18 U.S.C. §§ 371, 666(a)(1)(B).)

PREET BHARARA

United States Attorney.

A TRUE BILL

  
Foreperson.

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7/30/12  
MRB

Indictment filed with 2 arrest  
warrant. Case assigned to Judge Daniels  
for all purposes. . . . ELLIS, USMT.